

"SECRET"

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

(1) ALEJANDRO DIAZ-SANCHEZ,
a/k/a BARBAS
[DOB: 10/10/1972]

(2) MANUEL PINITU-ROSA,
[DOB: 12/31/1980]

(3) KERVIN GONZALEZ-BERNAL,
[DOB: 08/01/1989]

(4) MICHAEL B. PEDRINO,
[DOB: 12/09/1977]

(5) DARRELL VICTOR,
[DOB: 05/13/1982]

(6) RYAN C. WILLIAMS,
[DOB: 06/24/1978]

(7) AMANDA R. WILLIAMS,
[DOB: 06/15/1981]

(8) ASHLEY M. JORDISON,
[DOB: 06/08/1985]

(9) NICHOLAS M. SHEPARD,
[DOB: 05/05/1980]

(10) AARON M. GROVES,
[DOB: 12/03/1984]

(11) JEREMY SPECKER,
[DOB: 08/25/1985]

and

Case No. _____

COUNT ONE: ALL DEFENDANTS
(Conspiracy to Distribute Methamphetamine)
21 U.S.C. §§ 841(a)(1), (b)(1)(A) and 846
NLT: 10 Years and NMT Life Imprisonment
NMT: \$10,000,000 Fine
NLT: 5 Years Supervised Release
Class A Felony

COUNTS TWO and FOUR:
DEFENDANTS RYAN C. WILLIAMS and
AMANDA R. WILLIAMS
(Possession with the Intent to Distribute
Methamphetamine)
21 U.S.C. §§ 841(a)(1) and (b)(1)(B)
NLT: 5 Years and NMT 40 Years Imprisonment
NMT: \$5,000,000 Fine
NLT: 4 Years Supervised Release
Class B Felony

COUNTS FIVE and SIX:
DEFENDANTS AARON M. GROVES and
MICHAEL B. PEDRINO
(Possession with the Intent to Distribute
Methamphetamine)
21 U.S.C. §§ 841(a)(1) and (b)(1)(A)
NLT: 10 Years and NMT Life Imprisonment
NMT: \$10,000,000 Fine
NLT: 5 Years Supervised Release
Class A Felony

COUNTS THREE and SEVEN:
DEFENDANTS RYAN C. WILLIAMS and
MICHAEL B. PEDRINO
(Possession of Firearms and Drug Trafficking)
18 U.S.C. § 924(c)(1)(A)(i)
NLT 5 Years and NMT Life Imprisonment
Consecutive
NMT: \$250,000.00 Fine
NMT: 5 Years Supervised Release
Class A Felony

(12) LORENZO ANTONIO RUIZ,
[DOB: 08/01/1989]

Defendants.

FORFEITURE ALLEGATIONS:

ALL DEFENDANTS

21 U.S.C. § 853

Notice of Criminal Forfeiture

\$100 Mandatory Special Assessment Each
Count

DEFENDANT NO.	DEFENDANT NAME	COUNTS CHARGED
1	ALEJANDRO DIAZ-SANCHEZ, a/k/a BARBAS	1
2	MANUEL PINITU-ROSA	1
3	KERVIN GONZALEZ-BERNAL	1
4	MICHAEL B. PEDRINO	1, 6, 7
5	DARRELL VICTOR	1
6	RYAN C. WILLIAMS	1, 2, 3
7	AMANDA R. WILLIAMS	1, 4
8	ASHLEY M. JORDISON	1
9	NICHOLAS M. SHEPARD	1
10	AARON M. GROVES	1, 5
11	JEREMY SPECKER	1
12	LORENZO ANTONIO RUIZ	1

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE
(Conspiracy to Distribute Methamphetamine)

Between on or about August 1, 2017 and December 31, 2018, said dates being approximate, in the Western District of Missouri and elsewhere, ALEJANDRO DIAZ-SANCHEZ, a/k/a BARBAS, MANUEL PINITU-ROSA, KERVIN GONZALEZ-BERNAL, MICHAEL B. PEDRINO, DARRELL VICTOR, RYAN C. WILLIAMS, AMANDA R. WILLIAMS, ASHLEY M. JORDISON, NICHOLAS M. SHEPARD, AARON M. GROVES,

JEREMY SPECKER, and LORENZO ANTONIO RUIZ, defendants, did knowingly and intentionally combine, conspire, confederate and agree with each other and others both known and unknown to the grand jury, to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in an amount of 500 grams or more, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A), all in violation of Title 21, United States Code, Section 846.

COUNT TWO

(Possession with Intent to Distribute Methamphetamine)

On or about August 22, 2017, in the Western District of Missouri, RYAN C. WILLIAMS, defendant herein, did knowingly and intentionally possess with the intent to distribute methamphetamine, in an amount of 5 grams or more (actual), a Schedule II controlled substance, all contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

COUNT THREE

(Possession of Firearms and Drug Trafficking)

On or about August 22, 2017, in the Western District of Missouri, RYAN C. WILLIAMS, defendant herein, in furtherance of and during and in relation to a drug trafficking crime for which he may be prosecuted, as set out in Count Two of this indictment, did knowingly and intentionally carry, possess and use a firearm, to-wit: a Smith & Wesson M&P 9mm semiautomatic handgun bearing Serial Number HMJ2241, all contrary to the provisions of Title 18, United States Code, Sections 924(c)(1)(A)(i).

COUNT FOUR

(Possession with Intent to Distribute Methamphetamine)

On or about September 30, 2017, in the Western District of Missouri, AMANDA R. WILLIAMS, defendant herein, did knowingly and intentionally possess with the intent to distribute methamphetamine, in an amount of 5 grams or more (actual), a Schedule II controlled

substance, all contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

COUNT FIVE
(Possession with Intent to Distribute Methamphetamine)

On or about March 7, 2018, in the Western District of Missouri, AARON M. GROVES, defendant herein, did knowingly and intentionally possess with intent to distribute 50 grams or more of methamphetamine (actual), a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

COUNT SIX
(Possession with Intent to Distribute Methamphetamine)

On or about April 28, 2018, in the Western District of Missouri, MICHAEL B. PEDRINO, defendant herein, did knowingly and intentionally possess with intent to distribute 50 grams or more of methamphetamine (actual), a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

COUNT SEVEN
(Possession of Firearms and Drug Trafficking)

On or about April 28, 2018, in the Western District of Missouri, MICHAEL B. PEDRINO, defendant herein, in furtherance of and during and in relation to a drug trafficking crime for which he may be prosecuted, as set out in Count Six of this indictment, did knowingly and intentionally carry, possess and use a firearm, to-wit: a Taurus Millennium G2 9mm semiautomatic handgun, Serial Number TKW32260, all contrary to the provisions of Title 18, United States Code, Sections 924(c)(1)(A)(i).

ALLEGATION OF FORFEITURE

1. The allegations contained in Count One of this Indictment are re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of Title 21, United States Code, Section 853.

2. Each defendant shall forfeit to the United States all property, real and personal, constituting, or derived from, proceeds obtained, directly and indirectly, as a result of the violations incorporated by reference in this Allegation of Forfeiture and all property used, or intended to be used, in any manner or part, to commit, and to facilitate the commission of the violation alleged in Count One of this Indictment

SUBSTITUTE ASSETS

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty.

The United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL.

Dated: 5/1/19

/s/ Shannon Cassidy
FOREPERSON OF THE GRAND JURY

/s/ Joseph M. Marquez
Joseph M. Marquez #40634
Assistant United States Attorney
Western District of Missouri